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BASE REALIGNMENT AND CLOSURE
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Ser BPMOW.dr/399
December 20, 2019

John Chesnutt
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street
San Francisco, CA 94105-3901

Dear Mr. Chesnutt:

SUBJECT: US ENVIRONMENTAL PROTECTION AGENCY LETTER SENT 15 NOVEMBER 2019 ON THE HUNTERS POINT NAVAL SHIPYARD ADDENDUM TO THE 5 YEAR REVIEW EVALUATING RADIOLOGICAL REMEDIAL GOALS FOR SOIL

Thank you for providing U.S. Environmental Protection Agency's (EPA) comments on the August 2019 Draft Addendum (Addendum)for soil to the Fourth Five-Year Review Evaluation of Radiological Remedial Goals (Five-Year Review Report) for the Hunters Point Naval Shipyard (HPNS).

The EPA's November 15, 2019 letter included recommendations that affect three individual documents: the Addendum, the June 2019 Final Parcel G Removal Site Evaluation Work Plan (Parcel G Work Plan), and the upcoming Radiological Soil Background Concentration report.

EPA COMMENTS ON THE ADDENDUM – Generally, the EPA is recommending an evaluation of future site data to determine combined risk, to compare the risk versus 1 x 10-4, and to decide if any response action changes are required. The Navy agrees to evaluate combined risk (sans the contribution from background) for data collected as part of the radiological retesting of parcels at HPNS against the CERCLA risk management range and to determine if ROD changes are required. The Navy will prepare a responsiveness summary that details our responses to EPA and community comments on this document and attach this summary to the Final Addendum.

EPA PROPOSAL TO MODIFY THE PARCEL G WORKPLAN – The EPA recommended modifying the Parcel G Work Plan to clarify the contribution from background concentrations in the remedial goals. This recommendation must be resolved before the Navy can proceed with fieldwork.

The Navy and regulatory agencies discussed the technical challenges of addressing background radiological constituents in soil extensively during the development of the Parcel G Work Plan. Cesium, in particular, is the most difficult to address because of the wide range of background concentrations normally seen in the San Francisco Bay Region and the lack of methods to determine cesium's origin (site-related contaminant versus background).

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To focus cleanup on site-related contamination rather than background, the Navy proposes to utilize a threshold cesium value using site-specific data, data collected in local surfaces soils, and regional background literature (references to be used are listed below). In order to proceed with fieldwork, the Navy requests the EPA's concurrence on this approach by January 13, 2020; after which, the Navy will memorialize the approach to addressing background cesium in the Parcel G Work Plan Addendum and the upcoming Radiological Soil Background Concentration report.

We look forward to continuing our collaborative relationship on the cleanup of HPNS toward the ultimate goal of property transfer and safe redevelopment.

If you have further questions regarding this matter, please feel free to call me at (619) 524-6026.

Sincerely,

DEREK J. ROBINSON
BRAC Environmental Coordinator
By direction of the Director

References:

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